

REMARKS/ARGUMENTS

Applicants would like to thank the Examiner for the careful consideration given the present application. The application has been carefully reviewed in light of the Office Action, and this paper filed in response thereto.

Claims 7, 9–17, and 19–21 remain in this application. The remaining claims have been canceled.

Claims 7, 17, and 19–21 are indicated as being allowable by the Examiner. Claims 9–17 and 19–21 were previously indicated as being allowable by the Examiner. Claims 15 and 16 are objected to, but were indicated as being allowable if put into independent format.

Claims 9, 10, 13, and 14 are newly rejected under 15 U.S.C. §102(e) as being anticipated by Cambier *et al.* (U.S. 6,532,298). Claims 11 and 12 are newly rejected under 15 U.S.C. §102(e) as being unpatentable over Cambier. For the following reasons, the rejection is respectfully traversed.

Claim 9 recites an iris camera module comprising:

an image pickup optical system for picking up an image of the iris of a user; and

a target optical system including a target screen for displaying a target for aligning the eye of the user, wherein the target optical system and the image pickup optical system are integrated onto a common substrate.

The reference does not teach the “target screen” of the claim.

The Examiner argues that Cambier teaches a target screen via element 115 of Fig. 2A. Applicant maintains that the Examiner is seriously misreading the reference. Element 115 is defined as a “virtual image 115” which is a *reflected* image into the iris of the viewer that only *appears* to be an actual target image (see col. 4, lines 52–62). There is no screen at all, which is why the drawing uses dashed lines for element 115 (representing a *virtual* item), and

why the description uses the name “virtual image.” A complete reading of the reference shows that there is no teaching of any “target screen” at all. This has been previously pointed out to the Examiner. Accordingly, the Examiner has provided no new teaching for reopening the examination of claims 9, 10, 13, and 14, which were previously found to be allowable.

The Examiner also argues that the specification does not define the term “substrate”, and provides a suggested, relatively narrow definition. However, the Examiner has not provided a definition of the term “substrate” that actually reads on the housing 700. Applicant believes that the term “substrate,” as is known in the art, would not read on the housing 700 or telephone 575, whether coupled via printed circuit boards or not. Regardless, it is not necessary to narrowly define the term “substrate” to overcome the rejection, because the reference fails to teach the “target screen” of the claim.

Accordingly, claim 9 is patentable over the reference, because it does not teach a “target screen” and also because neither the housing 700 nor the phone 575 are properly construed as a “substrate” as one skilled in the art would understand the term. Claims 10–12, 13, and 14, which depend, directly or indirectly, upon claim 9, are thus patentable over the reference for at least the same reason.

In consideration of the foregoing analysis, it is respectfully submitted that the present application is in a condition for allowance and notice to that effect is hereby requested. If it is determined that the application is not in a condition for allowance, the Examiner is invited to initiate a telephone interview with the undersigned attorney to expedite prosecution of the present application.

If there are any additional fees resulting from this communication, please charge same to our Deposit Account No. 16-0820, our Order No. 33781.

Respectfully submitted,

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Date: July 28, 2005